

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

Civil Action No. 2:13-cv-00026

ALICIA HATFIELD,

Plaintiff,

Judge Nora Barry Fischer

vs.

AMANDA BERUBE and KATHLEEN  
TENNANT,

Defendants.

**DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Pursuant to Fed. R. Civ. P. 56, Defendants Amanda Berube and Kathleen Tennant file the following Motion for Summary Judgment.

1. Plaintiff, Alicia Hatfield, instituted this *pro se* civil rights action in the United States District Court for the Western District of Pennsylvania.
2. The remaining Defendants are Amanda Berube and Kathleen Tennant, who are sued in their individual capacities.
3. Plaintiff's remaining claims include:
  - a. 42 U.S.C.A § 1983 claims for violations of her Fourth and Fourteenth Amendment rights against both Defendants; and
  - b. A claim for Intentional Infliction of Emotional Distress ("IIED") against Defendant Berube.
4. The Defendants are entitled to judgment as a matter of law because Plaintiff has failed to make a showing sufficient to establish the existence of the elements essential her case, on which Plaintiff will bear the burden of proof at trial.
5. Plaintiff cannot maintain her § 1983 claims because she has failed to establish violations

of her Fourth and Fourteenth Amendment rights.

6. Plaintiff can produce no evidence of Defendant Tennant's personal involvement in the alleged violations.
7. Even if Plaintiff had been able to point to specific evidence of civil rights violations, the Defendants are entitled to immunity.
8. Furthermore, Plaintiff cannot maintain a claim for IIED against Defendant Berube based on the evidence of record.
9. Therefore, the Defendants are entitled to judgment as a matter of law.

WHEREFORE, Defendants respectfully request that their Motion for Summary Judgment be granted and summary judgment be entered in their favor.

Respectfully submitted,

/s/ Benjamin Trodden

Benjamin Trodden

Pa. I.D. No. 318406

Allegheny County Assistant Solicitor

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**CERTIFICATE OF SERVICE**

I, Benjamin Trodden, Assistant County Solicitor, certify that a true and correct copy of Defendants' MOTION FOR SUMMARY JUDGMENT was served on the following by e-mail and First Class Mail on the 13th of February 2017:

Emtalicia78@gmail.com  
Alicia Hatfield  
176 W. Hills Drive, Apt. E-17  
Greensburg, PA 15601  
(Pro Se Plaintiff)

Respectfully submitted,

/s/ Benjamin Trodden  
Benjamin Trodden  
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Allegheny County Assistant Solicitor

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